SUPREME COURT, U. S.

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In the Supreme Court of the United States

OCTOBER TERM, 1970.

No. 1675.

MORRISON MOTOR FREIGHT, INC.,
Petitioner,

v.

HELEN GRETA FOX,
Administratrix of the Estate of Harry Eugene Fox,
Respondent.

ON PETITION FOR A WRIT OF CERTIORARI TO
THE SUPREME COURT OF OHIO.

REPLY BRIEF FOR PETITIONER IN SUPPORT OF CERTIORARI.

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Respondent, opposing review, fails to answer whether a state can constitutionally give full faith to part only of the statute of a sister state and refuse full faith to another part. Rather, Respondent argues "governmental interest" (just as did the Supreme Court of Ohio).

This is precisely the vice that Article IV, Section 1 of the Constitution was designed to prevent. If, under the guise of "governmental interest" the courts may follow or ignore the public acts of sister states at their whim, then Article IV, Section 1 has been deleted from the Constitution by judicial fiat.

When it is remembered that this is a piece of private litigation in which the sovereign should have no interest, the argument will not wash. Article IV, Section 1 was designed to protect the interests of litigants, not governments.

Respectfully submitted,

THOMAS V. KOYKKA,
SMITH WARDER,
Attorneys for Petitioner,